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07375

Vanasse Hangen Brustlin, Inc.

October 9, 2001

Ref: 07375

Massachusetts Department of Environmental Protection
Southeast Regional Office
20 Riverside Drive
Lakeville, MA 02347

Re: Request for Special Project Designation Modification
Keith Middle School
70 Hathaway Boulevard
New Bedford, MA

Transmittal #W0230407

RTN #4-0015685

RTN #4-0018824

To Whom It May Concern:

Vanasse Hangen Brustlin, Inc. (VHB) is submitting this letter in order to request a modification to the Special Project Designation for Keith Middle School submitted by VHB on August 27, 2001. The request for Special Project designation modification, Special Project Transmittal Form, and certification required by 310 CMR 40.0009 have been prepared on behalf of the New Bedford Public School Department pursuant to the requirements of 310 CMR 40.0065 of the Massachusetts Contingency Plan (MCP). Figure 1 shows the locations of all properties addressed in this submittal.

1. Special Project History

On August 27, 2001, VHB submitted an application for Special Project designation of the McCoy Field in New Bedford, Massachusetts (Figure 2). McCoy Field has been selected as the site for construction of the new Keith Middle School, scheduled for completion in June, 2005. At that time, the current Keith Middle School building will be demolished. The reason for the Special Project application is to schedule the implementation of response actions to coincide with the construction of the new school, thus eliminating duplicative tasks. Construction of the new school will require significant site preparation and civil work such as excavation for foundations, utilities, and grading. Implementation of response actions will require a significant amount of site preparation and civil work as well. If response actions are conducted

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independently of construction, some work would have to be done more than once and/or work done for the school construction project would compromise work done as part of remediation.

2. Background Information - Present Keith Middle School Property

The Keith Middle School is located on a 11.3-acre parcel at 70 Hathaway Boulevard in New Bedford, Massachusetts (Figure 3). The site is bordered by residential apartments across Hathaway Boulevard to the west, residential properties to the north and south, and athletic fields across Hunter Street to the east.

There is an underground storage tank (UST) at the Site, which was installed in December 1990. The UST replaced a tank installed in 1955, which was removed from the same location at the time of the installation of the new tank. On October 11, 2000, during the advancement of a soil boring in the vicinity of the UST, VHB observed elevated volatile organic headspace readings in soil at a depth of 10 feet. Soil headspace readings exceeded 100 parts per million (ppm). The Department of Environmental Protection (DEP) was notified of the release on October 13, 2000, within 72 hours of discovery. As a result of the notification, the DEP issued Release Tracking Number 4-0015824. VHB subsequently submitted an IRA Plan to the DEP on November 20, 2000 detailing the following actions:

- Excavation, stockpiling, analysis and off-site disposal of up to 500 cubic yards of contaminated soil
- UST tightness testing
- Soil and groundwater sampling and analysis

In accordance with the IRA activities outlined in the IRA Plan, VHB performed a tightness test on the UST and sampled soil and groundwater from the UST area. Results indicated that the tank is tight and groundwater has not been impacted. It was concluded that the source of the headspace readings is a release from the tank previously in this location. The excavation and removal of the contaminated soil has not yet been completed.

3. Description of Modification Sought

This letter is a request to add the present location of the Keith Middle School to the scope of the Special Project designation. This would allow the excavation of the contaminated soil and removal of the UST to coincide with the demolition of the present Keith Middle School.

4. Rationale for Modification Sought

Adding the current school to the Special Project scope will eliminate duplicative tasks. Because the demolition of the school will require excavation to remove the basement



and underground utilities at the site, the removal of the tank and contaminated soil can be accomplished more efficiently if done in conjunction with the demolition.

The results of the UST tightness test indicate that the source of contamination at the present Keith Middle School was removed with the removal of the tank formerly located in the release location. In addition, soil and groundwater analytical testing indicate that soil contamination is confined to the area of the UST and that groundwater has not been impacted. VHB has thus concluded that an immediate response is not required and remedial actions could be postponed until 2005 without further detriment to the environment.

It is proposed to add the present Keith Middle School property to the Special Project scope, thereby deferring the remaining environmental response actions until the new school is constructed on McCoy field and the current school is demolished.

A completed DEP Special Project Transmittal Form and statement of certification are appended to this letter. If you have any questions, please feel free to contact me at (617) 924-1770.

Very truly yours,

VANASSE HANGEN BRUSTLIN, INC.



P. Douglas Burgess, P.E., L.S.P.

cc: Mr. Michael Longo, New Bedford Public School Department
Dave Ferguson, New Bedford Public School Department
Scott Alfonse, New Bedford Planning
Evan Warner, Mt. Vernon Group
Al Hanscom, VHB

Attachments: Figure 1 - Site Locations Plan
Figure 2 - McCoy Field Site Plan
Figure 3 - Keith Middle School Site Plan
Transmittal Form
Certification of Submittal



Certification of Submittal [310 CMR 40.0062(1)(1)]

"I, David J. Ferguson, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this submittal, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the person or entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate or incomplete information."

By: David J. Ferguson 10/9/01
Signature Date

David J. Ferguson Facility Manager
Print Name Print Title

For: New Bedford Public Schools
Name of person or entity